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*Attorneys for Defendants Elbit Systems Ltd., Michael Federmann, Joseph Ackerman, Joseph Gaspar, and Estate of Jacob Toren*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendants Elbit Systems Ltd. (“Elbit”), Michael Federmann, Joseph Ackerman, Joseph Gaspar, and the Estate of Jacob Toren (collectively, “Elbit Defendants”) hereby provide their Initial Disclosures. These Initial Disclosures are based upon good faith inquiry and information now known and reasonably available to the Elbit Defendants. These Initial Disclosures are made expressly subject to and without waiving any applicable privileges or exemptions from discovery and any right to a protective order. The Elbit Defendants reserve the right to amend or supplement these disclosures, as well as other discovery responses, pursuant to Fed. R. Civ. P. 26(e). In addition, the following disclosures are made subject to and without waiving:

- (i) any objections as to competency, relevancy, materiality or admissibility in any subsequent proceedings or the trial of this or any other action;
- (ii) the right to object to the use of these disclosures or documents and information obtained as a result of these disclosures, or the subject matter thereof, in any subsequent proceedings or the trial of this or any other action; and
- (iii) the right to object to any demand for further disclosures or to other discovery involving or relating to the subject matter of these disclosures.

**I. INDIVIDUALS/ORGANIZATIONS LIKELY TO HAVE  
DISCOVERABLE INFORMATION ON WHICH THE ROSENS  
MAY RELY IN SUPPORTING THEIR CLAIMS AND DEFENSES.**

Based on the information now known or reasonably available to them, the Elbit Defendants believe that the following individuals or organizations may have discoverable information that the Elbit Defendants may use to support defenses in this action:

Haim Rousso  
Industrial Science Park  
P.O.B. 1165  
Rehovot 76111  
Israel  
Tel: 972-8-9386756

Joseph Gaspar  
Advanced Technology Center  
P.O.B 539  
Haifa 31053  
Israel  
Tel: 972-4-8316404

Joseph Ackerman  
Advanced Technology Center  
P.O.B. 539  
Haifa 31053  
Israel  
Tel: 972-4-8315526/972-4-8550177

Michael Federmann  
87 Hayarkon St.  
Tel-Aviv  
Yafo 63432  
Israel  
Tel: 972-3-5241135

Tova Toren  
10 Havered St.  
Nes-Ziona 74063  
Israel  
Tel: 972-8-9403053

David Block Temin  
Advanced Technology Center  
P.O.B 539  
Haifa 31053  
Israel  
Tel: 972-4-8316626/972-4-8317908

Avigdor Blasberger  
Address and telephone number to be determined

Elbit Systems Ltd.  
Advanced Technology Center  
P.O.B 539  
Haifa 31053  
Israel  
Tel: 972-4-8316626/972-4-8317908

Elbit Systems  
Electro-Optics  
Elop Ltd.  
Industrial Science Park  
P.O.B. 1165  
Rehovot 76111  
Israel  
Tel: 972-8-9386432

**II. DOCUMENTS ON WHICH THE ELBIT DEFENDANTS MAY RELY  
IN SUPPORTING THEIR DEFENSES.**

The Elbit Defendants intend to rely on Elbit's corporate books and records in supporting their defenses. These documents are maintained at the following address:

Elbit Systems Ltd.  
Advanced Technology Center  
P.O.B 539  
Haifa 31053  
Israel  
Tel: 972-4-8316626/972-4-8317908

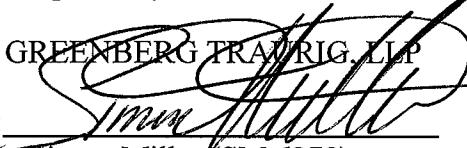
### III. INSURANCE AGREEMENTS

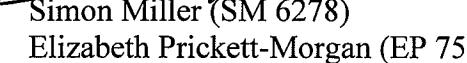
The Elbit Defendants are covered by the following insurance agreement, a copy of which will be provided to Plaintiffs under separate cover, which may be available to satisfy all or part of any judgment against the Elbit Defendants:

CorporateGuard for Directors and Officers  
Policy No. 2520000687/06  
Issued to: Elbit Systems Ltd.  
By: Migdal Insurance Company

Dated: New York, New York  
October 10, 2007

Respectfully submitted,

 GREENBERG TRAURIG, LLP

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*(Pro Hac Vice applications  
forthcoming)*

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Joseph Ackerman, Joseph Gaspar, and  
Estate of Jacob Toren*

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